



CAITLIN C. CARRIGG
CRAIG D. CHARTIER
MARK S. HOLLENBECK
KEVIN C. HOYT
ANTHONY B. IACOVANGELO
FRANK B. IACOVANGELO
TRISHA L. KIRSCH
EUGENE M. O'CONNOR
JOHN C. PALERMO
MICHAEL J. RINGROSE
SEEMA ALI RIZZO
DAVID D. SPOTO

SUITE 100
180 CANAL VIEW BLVD.
ROCHESTER, NEW YORK 14623

TELEPHONE (585) 454-7145
FAX (585) 454-2476

Email: info@gallolaw.com
Web Page: <http://www.GalloLaw.com>

MINDY A. ST. JOHN
SANDRA G. WILMOT
JAMES S. WOLFORD
EDWARD A. WURTZ

HON. JOHN M. OWENS
Of Counsel
Surrogate Court Judge
2014-2020
Supreme Court Justice
2005-2013

LOUIS J. GALLO
1919 - 2015

December 12, 2022

VIA CM/ECF

Hon. Brenda K. Sannes
United States District Judge
Federal Building and U.S. Courthouse
P.O. Box 7336
Syracuse, NY 13261-7336

RE: *USA v. Jared Marc Brown*
1:19-cr-00095-BKS

Dear Judge Sannes:

I represent Mr. Brown who is currently scheduled for sentencing on December 22, 2022, at 9:30 a.m.

At this time, Mr. Brown is housed in the Northeast Ohio Correctional Center which is approximately a five (5) hour drive from the Rochester courthouse. I visited Mr. Brown on December 7, 2022, and we were unable to have a contact visit due to his COVID concerns. Additionally, based upon his recent medical issues at NEOCC and the stress that could arise from a ten (10) hour round trip drive, we respectfully request that Mr. Brown's appearance for sentencing be virtual. Mr. Brown did confirm this request during my visit.

As a matter of procedure, the only objection in the Pre-Sentence Report of July 21, 2022 is with respect to the lack of Adjustment for Acceptance of Responsibility. I respectfully request that Mr. Brown's Sentence Statement and accompanying legal Memorandum of Law be due on December 15, 2022.

Respectfully yours,
GALLO & IACOVANGELO, LLP

James S. Wolford, Esq.
Direct Dial: (585) 340-4205
Email: JamesWolford@Gallolaw.com

/JSW